

REQUEST FOR RECONSIDERATION  
March 20, 2006

YOR920030315US1  
Serial No. 10/690,238

### REMARKS

Claims 1 – 28 remain in the application and stand rejected. The rejection of the claims is respectfully traversed.

Claims 1 – 2 are rejected under 35 U.S.C. §102(b) over U.S. Patent No. 5,610,833 to Chang et al. Claims 3 – 28 are rejected under 35 U.S.C. §103(a) over U.S. Patent No. 6,665,849 to Meuris et al. in combination with Chang et al. The rejection is respectfully traversed.

Regarding the rejection of claims 1 and 2, it is asserted that Chang et al. teaches “a template generation engine interfaced with said GUI and generating multidimensional templates (Four subsystems are integrated: (a) a batch-mode computation module that combines a 2-D/3-D finite difference numerical simulation and a fast interpolation algorithm and (d) a spreadsheet-style graphical user interface (col. 3, l. 40-48)” (emphasis the Examiner’s).

However, Chang et al. specifically proclaims that a major advantage of the Chang et al. invention is that it “allows VLSI designers to specify accurate interconnect models as easy as transistor models **without** any 2-D/3-D simulations. Existing SPICE simulator software is used unmodified.” Col. 20, lines 64 – 68 (emphasis added). *See also*, col. 19, lines 33 – 40 (If the SPICE deck is not parameterized, 2D/3D simulations are done manually, a long arduous task.) Moreover, Chang et al. teaches away from 2D/3D simulations. Col. 21, lines 13 – 20. Thus, very clearly, Chang et al. neither discloses or suggests “a template generation engine interfaced with said GUI and generating multi-dimensional templates from interconnect configuration files” as claim 1 recites. Since claim 1 is neither taught nor suggested by Chang et al., Chang et al. does not teach the present invention as recited by claim 1.

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Furthermore, since dependent claims include all of the differences with the prior art as the claims from which they depend, claim 2 is neither taught nor suggested by Chang et al., alone or, further in combination with any reference of record. Reconsideration and withdrawal of the rejection of claims 1 and 2 under 35 U.S.C. §102(e) over Chang et al. is respectfully requested.

Regarding the rejection of claims 3 and 15 over the combination of Chang et al. and Meuris et al., it is acknowledged that Meuris et al. fails to teach "a computer aided design system further comprising a template generation engine generating templates from interconnect configuration files." Accordingly, since neither Meuris et al. nor Chang et al. teaches "a computer aided design system further comprising a template generation engine generating templates from interconnect configuration files," the combination of Meuris et al. and Chang et al. does not result the present invention as recited in claims 3 and 15. Further, since Chang et al. teaches away from 2D/3D simulations as noted hereinabove, combining Chang et al. with any reference of record to result in the present invention is non-obvious under 35 U.S.C. §103(a). Therefore, the combination of Meuris et al. and Chang et al. is neither suggested nor, does it result in, the present invention as recited in claims 3 and 15.

Since dependent claims include all of the differences with the prior art as the claims from which they depend, claims 4 – 14 and 16 – 28, which depend from claims 3 and 15, respectively, are not made obvious by the combination Meuris et al. with Chang et al. or, further in combination with any reference of record. Nor does such a combination result in the present invention as recited in claims 4 – 14 and 16 – 28. Reconsideration and withdrawal of the rejection of claims 3 – 28 under 35 U.S.C. §103(a) over Meuris et al. in combination with Chang et al. is respectfully requested.

The applicants thank the Examiner for efforts, both past and present, in examining the application. Believing the application to be in condition for allowance for the reasons

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set forth above, the applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 1 – 28 under 35 U.S.C. §§102(e) and 103(a) and allow the application to issue.


Should the Examiner believe anything further may be required, the Examiner is requested to contact the undersigned attorney at the local telephone number listed below for a telephonic or personal interview to discuss any other changes.

Please charge any deficiencies in fees and credit any overpayment of fees to IBM Corporation Deposit Account No. 50-0510 and advise us accordingly.

Respectfully Submitted,

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(Date)

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